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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 EPIDEMIC SOUND, AB,

17 Plaintiff,

18 vs.

19 META PLATFORMS, INC., f/k/a FACEBOOK,  
INC.,

20 Defendant.  
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CASE NO. 3:22-cv-04223-JSC

**PLAINTIFF EPIDEMIC SOUND, AB'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER TO FILE  
UNDER SEAL NEWLY PRODUCED  
DOCUMENTS IN SUPPORT OF  
EPIDEMIC SOUND, AB'S SEPTEMBER  
25, 2024 JOINT DISCOVERY DISPUTE  
CONCERNING RIGHTS MANAGER  
DATA**

The Honorable Jacqueline Scott Corley

Pursuant to Local Rules 7-11 and 79-5(f), Plaintiff Epidemic Sound, AB (“Epidemic”) respectfully moves for an order to consider whether to seal the accompanying evidence supporting Epidemic’s September 25, 2024 joint discovery dispute concerning Defendant Meta Platform Inc.’s (“Meta”) refusal to produce the requested Rights Manager data export (the “Joint Dispute”), which documents were not produced by Meta until September 30, 2024 and which Meta has designated as “Confidential” under the Protective Order in this action (Dkt. 74). Epidemic has reviewed and complied with section E of the Court’s February 17, 2023 Civil Standing Order and has reviewed and complied with Local Rule 79-5.

The reasons and bases for considering the sealing of the materials identified below are set forth in the accompanying Declaration of M. Mona Simonian In Support Of Epidemic’s Administrative Motion To File Under Seal (“Simonian Declaration”). Epidemic requests that the following material be considered to be filed under seal:

| Document   | Designating Party |
|--|-------------------|
| Simonian Declaration, Page 1, Lines 20-24; Page 2, Lines 1-2.            | Meta              |
| Simonian Declaration, Exhibit 1<br>(META-EPDMS_00188110-12 and 00188113) | Meta              |

While Epidemic takes no position with regard to the propriety of Meta’s designation of confidentiality, Meta has designated the documents identified above as “Confidential” to Meta.

This motion is accompanied by the Simonian Declaration attaching the exhibits to be considered for sealing and a Proposed Order.

*[Remainder Intentionally Left Blank]*

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Dated: October 2, 2024

Respectfully submitted,  
PRYOR CASHMAN LLP

By: Mona Simonian  
M. Mona Simonian

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**ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Date: October 2, 2024

/s/ Adam S. Cashman  
Adam S. Cashman